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January 11, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
Frank R. Lautenberg U.S.P.O.  
& Courthouse  
2 Federal Square  
Newark, New Jersey 07102

Re: *In re Insulin Pricing Litigation*, Civil Action No. 2:23-md-3080

Dear Judge Martinotti,

In furtherance of Your Honor's text order dated December 26, 2023 (ECF No. 58) and the parties' related submissions, we submit a proposed Common Benefit Order addressing common benefit work performed before the formation of this multidistrict litigation ("MDL") supported by all of the Plaintiffs. Through this Order, participating counsel will be entitled to receive pre-MDL common benefit work product, and the counsel who generated this work product will be entitled to seek compensation for common benefit work and expenses through an agreed upon process established by the proposed Order.

If this proposed Common Benefit Order is acceptable to the Court, we kindly ask that Your Honor enter it.

Thank you for Your Honor's continued attention to this matter.

January 11, 2024

Page 2

Respectfully submitted,

/s/James E. Cecchi

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cc: All Counsel of Record